

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

KASEY ANN PEARSON
2325 Pargo Place
Gold River, CA 95670

Registered Nurse License No. 374535
Nurse Practitioner Certificate No. 6811
Nurse Practitioner Furnishing Certificate No. 6811

Respondent

Case No. 2012-652

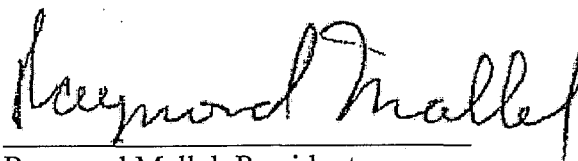
OAH No. 2012050373

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **January 30, 2013.**

IT IS SO ORDERED **December 31, 2012.**



Raymond Mallel, President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 KAMALA D. HARRIS
Attorney General of California
2 ALFREDO TERRAZAS
Senior Assistant Attorney General
3 JANICE K. LACHMAN
Supervising Deputy Attorney General
4 State Bar No. 186131
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 445-7384
Facsimile: (916) 327-8643
7 *Attorneys for Complainant*

8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

12 **KASEY ANN PEARSON**
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15 **Nurse Practitioner Certificate No. 6811**
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16 Respondent.

Case No. 2012-652

OAH No. 2012050373

STIPULATED SETTLEMENT
AND DISCIPLINARY ORDER

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19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
20 entitled proceedings that the following matters are true:

21 PARTIES

22 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Executive Officer of the Board of
23 Registered Nursing. She brought this action solely in her official capacity and is represented in
24 this matter by Kamala D. Harris, Attorney General of the State of California, by Janice K.
25 Lachman, Supervising Deputy Attorney General.

26 2. Respondent Kasey Ann Pearson (Respondent) is represented in this proceeding by
27 attorney Gary P. Harrell, whose address is: 2200 River Plaza Drive, Sacramento, CA 95833.

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3. On or about August 31, 1984, the Board of Registered Nursing issued Registered Nurse License No. 374535 to Respondent. The Registered Nurse License was in full force and effect at all times relevant to the charges brought in Accusation No. 2012-652 and will expire on March 31, 2014, unless renewed.

4. On or about November 1, 1993, the Board of Registered Nursing issued Nurse Practitioner Certificate No. 6811 to Respondent. The Nurse Practitioner Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 2012-652 and will expire on March 31, 2014, unless renewed.

5. On or about April 15, 1996, the Board of Registered Nursing issued Nurse Practitioner Furnisher Certificate No. 6811 to Respondent. The Nurse Practitioner Furnisher Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 2012-652 and will expire on March 31, 2014, unless renewed.

JURISDICTION

6. Accusation No. 2012-652 was filed before the Board of Registered Nursing (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on April 20, 2012. Respondent timely filed her Notice of Defense contesting the Accusation.

7. A copy of Accusation No. 2012-652 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

8. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 2012-652. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

9. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to

1 compel the attendance of witnesses and the production of documents; the right to reconsideration
2 and court review of an adverse decision; and all other rights accorded by the California
3 Administrative Procedure Act and other applicable laws.

4 10. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
5 every right set forth above.

6 CULPABILITY

7 11. Respondent admits the truth of each and every charge and allegation in Accusation
8 No. 2012-652.

9 12. Respondent agrees that her Registered Nurse License is subject to discipline and she
10 agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

11 RESERVATION

12 13. The admissions made by Respondent herein are only for the purposes of this
13 proceeding, or any other proceedings in which the Board of Registered Nursing or other
14 professional licensing agency is involved, and shall not be admissible in any other criminal or
15 civil proceeding.

16 CONTINGENCY

17 14. This stipulation shall be subject to approval by the Board of Registered Nursing.
18 Respondent understands and agrees that counsel for Complainant and the staff of the Board of
19 Registered Nursing may communicate directly with the Board regarding this stipulation and
20 settlement, without notice to or participation by Respondent or her counsel. By signing the
21 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek
22 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
23 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
24 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
25 action between the parties, and the Board shall not be disqualified from further action by having
26 considered this matter.

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15. The parties understand and agree that facsimile or electronic copies of this Stipulated Settlement and Disciplinary Order, including facsimile or electronic signatures thereto, shall have the same force and effect as the originals.

16. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

17. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 374535, Nurse Practitioner Certificate No. 6811, and Nurse Practitioner Furnisher Certificate No. 6811, all issued to Respondent Kasey Ann Pearson, are revoked. However, the revocations are stayed and Respondent is placed on probation for three (3) years on the following terms and conditions.

Severability Clause. Each condition of probation contained herein is a separate and distinct condition. If any condition of this Order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other applications thereof, shall not be affected. Each condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

1. **Obey All Laws.** Respondent shall obey all federal, state and local laws. A full and detailed account of any and all violations of law shall be reported by Respondent to the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of compliance with this condition, Respondent shall submit completed fingerprint forms and fingerprint fees within 45 days of the effective date of the decision, unless previously submitted as part of the licensure application process.

1 **Criminal Court Orders:** If Respondent is under criminal court orders, including
2 probation or parole, and the order is violated, this shall be deemed a violation of these probation
3 conditions, and may result in the filing of an accusation and/or petition to revoke probation.

4 2. **Comply with the Board's Probation Program.** Respondent shall fully comply with
5 the conditions of the Probation Program established by the Board and cooperate with
6 representatives of the Board in its monitoring and investigation of the Respondent's compliance
7 with the Board's Probation Program. Respondent shall inform the Board in writing within no
8 more than 15 days of any address change and shall at all times maintain an active, current license
9 status with the Board, including during any period of suspension.

10 Upon successful completion of probation, Respondent's license shall be fully restored.

11 3. **Report in Person.** Respondent, during the period of probation, shall appear in
12 person at interviews/meetings as directed by the Board or its designated representatives.

13 4. **Residency, Practice, or Licensure Outside of State.** Periods of residency or
14 practice as a registered nurse outside of California shall not apply toward a reduction of this
15 probation time period. Respondent's probation is tolled, if and when she resides outside of
16 California. Respondent must provide written notice to the Board within 15 days of any change of
17 residency or practice outside the state, and within 30 days prior to re-establishing residency or
18 returning to practice in this state.

19 Respondent shall provide a list of all states and territories where she has ever been licensed
20 as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide
21 information regarding the status of each license and any changes in such license status during the
22 term of probation. Respondent shall inform the Board if she applies for or obtains a new nursing
23 license during the term of probation.

24 5. **Submit Written Reports.** Respondent, during the period of probation, shall submit
25 or cause to be submitted such written reports/declarations and verification of actions under
26 penalty of perjury, as required by the Board. These reports/declarations shall contain statements
27 relative to Respondent's compliance with all the conditions of the Board's Probation Program.

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Respondent shall immediately execute all release of information forms as may be required by the Board or its representatives.

Respondent shall provide a copy of this Decision to the nursing regulatory agency in every state and territory in which she has a registered nurse license.

6. Function as a Registered Nurse. Respondent, during the period of probation, shall engage in the practice of registered nursing in California for a minimum of 24 hours per week for six consecutive months or as determined by the Board.

For purposes of compliance with the section, "engage in the practice of registered nursing" may include, when approved by the Board, volunteer work as a registered nurse, or work in any non-direct patient care position that requires licensure as a registered nurse.

The Board may require that advanced practice nurses engage in advanced practice nursing for a minimum of 24 hours per week for six consecutive months or as determined by the Board.

If Respondent has not complied with this condition during the probationary term, and Respondent has presented sufficient documentation of her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of Respondent's probation period up to one year without further hearing in order to comply with this condition. During the one year extension, all original conditions of probation shall apply.

7. Employment Approval and Reporting Requirements. Respondent shall obtain prior approval from the Board before commencing or continuing any employment, paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all performance evaluations and other employment related reports as a registered nurse upon request of the Board.

Respondent shall provide a copy of this Decision to her employer and immediate supervisors prior to commencement of any nursing or other health care related employment.

In addition to the above, Respondent shall notify the Board in writing within seventy-two (72) hours after she obtains any nursing or other health care related employment. Respondent shall notify the Board in writing within seventy-two (72) hours after she is terminated or

1 separated, regardless of cause, from any nursing, or other health care related employment with a
2 full explanation of the circumstances surrounding the termination or separation.

3 **8. Supervision.** Respondent shall obtain prior approval from the Board regarding
4 Respondent's level of supervision and/or collaboration before commencing or continuing any
5 employment as a registered nurse, or education and training that includes patient care.

6 Respondent shall practice only under the direct supervision of a registered nurse in good
7 standing (no current discipline) with the Board of Registered Nursing, unless alternative methods
8 of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are
9 approved.

10 Respondent's level of supervision and/or collaboration may include, but is not limited to the
11 following:

12 (a) Maximum - The individual providing supervision and/or collaboration is present in
13 the patient care area or in any other work setting at all times.

14 (b) Moderate - The individual providing supervision and/or collaboration is in the patient
15 care unit or in any other work setting at least half the hours Respondent works.

16 (c) Minimum - The individual providing supervision and/or collaboration has person-to-
17 person communication with Respondent at least twice during each shift worked.

18 (d) Home Health Care - If Respondent is approved to work in the home health care
19 setting, the individual providing supervision and/or collaboration shall have person-to-person
20 communication with Respondent as required by the Board each work day. Respondent shall
21 maintain telephone or other telecommunication contact with the individual providing supervision
22 and/or collaboration as required by the Board during each work day. The individual providing
23 supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to
24 patients' homes visited by Respondent with or without Respondent present.

25 **9. Employment Limitations.** Respondent shall not work for a nurse's registry, in any
26 private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse,
27 or for an in-house nursing pool.

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1 Respondent shall not work for a licensed home health agency as a visiting nurse unless the
2 registered nursing supervision and other protections for home visits have been approved by the
3 Board. Respondent shall not work in any other registered nursing occupation where home visits
4 are required.

5 Respondent shall not work in any health care setting as a supervisor of registered nurses.
6 The Board may additionally restrict Respondent from supervising licensed vocational nurses
7 and/or unlicensed assistive personnel on a case-by-case basis.

8 Respondent shall not work as a faculty member in an approved school of nursing or as an
9 instructor in a Board approved continuing education program.

10 Respondent shall work only on a regularly assigned, identified and predetermined
11 worksite(s) and shall not work in a float capacity.

12 If Respondent is working or intends to work in excess of 40 hours per week, the Board may
13 request documentation to determine whether there should be restrictions on the hours of work.

14 10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall enroll and
15 successfully complete a course(s) relevant to the practice of registered nursing no later than six
16 months prior to the end of her probationary term.

17 Respondent shall obtain prior approval from the Board before enrolling in the course(s).
18 Respondent shall submit to the Board the original transcripts or certificates of completion for the
19 above required course(s). The Board shall return the original documents to Respondent after
20 photocopying them for its records.

21 11. **Cost Recovery.** Respondent shall pay to the Board costs associated with its
22 investigation and enforcement pursuant to Business and Professions Code section 125.3 in the
23 amount of \$895. Respondent shall be permitted to pay these costs in a payment plan approved by
24 the Board, with payments to be completed no later than three months prior to the end of the
25 probation term.

26 If Respondent has not complied with this condition during the probationary term, and
27 Respondent has presented sufficient documentation of her good faith efforts to comply with this
28 condition, and if no other conditions have been violated, the Board, in its discretion, may grant an

1 extension of Respondent's probation period up to one year without further hearing in order to
2 comply with this condition. During the one year extension, all original conditions of probation
3 will apply.

4 **12. Violation of Probation.** If Respondent violates the conditions of her probation, the
5 Board after giving Respondent notice and an opportunity to be heard, may set aside the stay order
6 and impose the stayed discipline (revocation/suspension) of Respondent's license.

7 If during the period of probation, an accusation or petition to revoke probation has been
8 filed against Respondent's license or the Attorney General's Office has been requested to prepare
9 an accusation or petition to revoke probation against Respondent's license, the probationary
10 period shall automatically be extended and shall not expire until the accusation or petition has
11 been acted upon by the Board.

12 **13. License Surrender.** During Respondent's term of probation, if she ceases practicing
13 due to retirement, health reasons or is otherwise unable to satisfy the conditions of probation,
14 Respondent may surrender her license to the Board. The Board reserves the right to evaluate
15 Respondent's request and to exercise its discretion whether to grant the request, or to take any
16 other action deemed appropriate and reasonable under the circumstances, without further hearing.
17 Upon formal acceptance of the tendered license and wall certificate, Respondent will no longer be
18 subject to the conditions of probation.

19 Surrender of Respondent's license shall be considered a disciplinary action and shall
20 become a part of Respondent's license history with the Board. A registered nurse whose license
21 has been surrendered may petition the Board for reinstatement no sooner than the following
22 minimum periods from the effective date of the disciplinary decision:

23 (1) Two years for reinstatement of a license that was surrendered for any reason other
24 than a mental or physical illness; or

25 (2) One year for a license surrendered for a mental or physical illness.

26 **14. Mental Health Examination.** Respondent shall, within 45 days of the effective date
27 of this Decision, have a mental health examination including psychological testing as appropriate
28 to determine her capability to perform the duties of a registered nurse. The examination will be

1 performed by a psychiatrist, psychologist or other licensed mental health practitioner approved by
2 the Board. The examining mental health practitioner will submit a written report of that
3 assessment and recommendations to the Board. All costs are the responsibility of Respondent.
4 Recommendations for treatment, therapy or counseling made as a result of the mental health
5 examination will be instituted and followed by Respondent.

6 If Respondent is determined to be unable to practice safely as a registered nurse, the
7 licensed mental health care practitioner making this determination shall immediately notify the
8 Board and Respondent by telephone, and the Board shall request that the Attorney General's
9 office prepare an accusation or petition to revoke probation. Respondent shall immediately cease
10 practice and may not resume practice until notified by the Board. During this period of
11 suspension, Respondent shall not engage in any practice for which a license issued by the Board
12 is required, until the Board has notified Respondent that a mental health determination permits
13 Respondent to resume practice. This period of suspension will not apply to the reduction of this
14 probationary time period.

15 If Respondent fails to have the above assessment submitted to the Board within the 45-day
16 requirement, Respondent shall immediately cease practice and shall not resume practice until
17 notified by the Board. This period of suspension will not apply to the reduction of this
18 probationary time period. The Board may waive or postpone this suspension only if significant,
19 documented evidence of mitigation is provided. Such evidence must establish good faith efforts
20 by Respondent to obtain the assessment, and a specific date for compliance must be provided.
21 Only one such waiver or extension may be permitted.

22 **15. Therapy or Counseling Program.** Respondent, at her expense, shall participate in
23 an on-going counseling program until such time as the Board releases her from this requirement
24 and only upon the recommendation of the counselor. Written progress reports from the counselor
25 will be required at various intervals.

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DATED: 9/21/12

KASEY ANN PEARSON
Respondent

DATED: 9/21/12

GARY P. HARRELL
Vice President & Regional Counsel
Office of the General Counsel, Sutter Health
Attorney for Respondent

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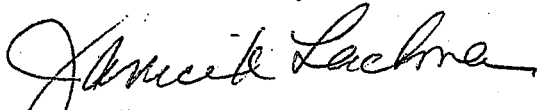
ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated: 10/23/12

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
ALFREDO TERRAZAS
Senior Assistant Attorney General


JANICE K. LACHMAN
Supervising Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 2012-652

1 KAMALA D. HARRIS
Attorney General of California
2 ALFREDO TERRAZAS
Senior Assistant Attorney General
3 JANICE K. LACHMAN
Supervising Deputy Attorney General
4 State Bar No. 186131
1300 I Street, Suite 125
5 P.O. Box 944255
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12 **KASEY ANN PEARSON**
13 **2325 Pargo Place**
Gold River, CA 95670

A C C U S A T I O N

14 **Registered Nurse License No. 374535**
15 **Nurse Practitioner Certificate No. 6811**
Nurse Practitioner Furnisher Certificate No. 6811

16 Respondent.

17
18 Louise R. Bailey, M.Ed., RN ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the Interim
21 Executive Officer of the Board of Registered Nursing ("Board").

22 **Registered Nurse License**

23 2. On or about August 31, 1984, the Board issued Registered Nurse License
24 Number 374535 to Kasey Ann Pearson ("Respondent"). The license was in full force and effect
25 at all times relevant to the charges brought herein and will expire on March 31, 2014, unless
26 renewed.

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1 **Nurse Practitioner Certificate**

2 3. On or about November 1, 1993, the Board issued Nurse Practitioner Certificate
3 Number 6811 to Respondent. The license was in full force and effect at all times relevant to the
4 charges brought herein and will expire on March 31, 2014, unless renewed.

5 **Nurse Practitioner Furnishing Certificate**

6 4. On or about April 15, 1996, the Board issued Nurse Practitioner Furnishing
7 Certificate Number 6811 to Respondent. The license was in full force and effect at all times
8 relevant to the charges brought herein and will expire on March 31, 2014, unless renewed.

9 **JURISDICTION**

10 5. Business and Professions Code ("Code") section 2750 provides, in pertinent part, that
11 the Board may discipline any licensee, including a licensee holding a temporary or an inactive
12 license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing
13 Practice Act.

14 6. Code section 2764 provides, in pertinent part, that the expiration of a license shall not
15 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or
16 to render a decision imposing discipline on the license. Under Code section 2811(b), the Board
17 may renew an expired license at any time within eight years after the expiration.

18 **STATUTORY PROVISIONS**

19 7. Code section 2761 states, in pertinent part:

20 "The board may take disciplinary action against a certified or licensed nurse or deny an
21 application for a certificate or license for any of the following:

22 (a) Unprofessional conduct.

23 (f) Conviction of a felony or of any offense substantially related to the qualifications,
24 functions, and duties of a registered nurse, in which event the record of the conviction shall be
25 conclusive evidence thereof."

26 **COST RECOVERY**

27 8. Code section 125.3 provides, in pertinent part, that the Board may request the
28 administrative law judge to direct a licensee found to have committed a violation or violations of

1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
2 enforcement of the case.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Conviction of a Crime)**

5 9. Respondent is subject to discipline under Code section 2761(f), in that on or about
6 October 9, 2009, in the case of *People v. Kasey Ann Pearson*, (Super. Ct. Sacramento County,
7 Case No. 08F07573), Respondent was convicted by the Court on her plea of nolo contendere of
8 violating Penal Code section 182(a) (conspiracy to influence testimony), a felony. The
9 circumstances of the crime were that on or about and between November 26, 2008, and
10 December 3, 2008, Respondent unlawfully conspired together and with another person and
11 persons whose identity is unknown to commit the crime of bribery, in violation of Penal Code
12 section 137(a), a felony; in that pursuant to and for the purpose of carrying out the objects
13 and purposes of the aforesaid conspiracy, on or about November 26, 2008, November 28, 2008,
14 December 1, 2008, and December 3, 2008, Respondent attempted to contact A. M. by telephone
15 for purposes of arranging a meeting to offer her a bribe within the meaning of Penal Code section
16 137(a). At the time of the above described acts, Respondent's fiance was incarcerated and facing
17 charges of violating Penal Code section 261(a)(2).

18 **PRAYER**

19 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged,
20 and that following the hearing, the Board of Registered Nursing issue a decision:

21 1. Revoking or suspending Registered Nurse License Number 374535, issued to Kasey
22 Ann Pearson;

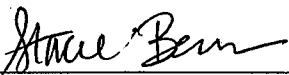
23 2. Revoking or suspending Nurse Practitioner License Certificate 6811, issued to Kasey
24 Ann Pearson;

25 3. Revoking or suspending Nurse Practitioner Furnishing Certificate Number 6811,
26 issued to Kasey Ann Pearson;
27
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1 4. Ordering Kasey Ann Pearson to pay the Board of Registered Nursing the reasonable
2 costs of the investigation and enforcement of this case, pursuant to Business and Professions
3 Code section 125.3; and,

4 5. Taking such other and further action as deemed necessary and proper.

5 DATED: April 20, 2012

for 
LOUISE R. BAILEY, M.Ed., RN
Interim Executive Officer
Board of Registered Nursing
State of California
Complainant

9 SA2011101740
10 Accusation (W)_1